

REMARKS

Referring to the final Office action mailed May 15, 2006, Applicants have carefully studied the Examiner's rejections to the pending claims, and have amended claims 15 and 27 accordingly. Each of the amendments to the subject claims are adequately supported in the originally filed specification and shown in the corresponding figures.

Claims 15-36 stand rejected under 35 U.S.C. § 102(b) as anticipated by or, in the alternative, under 35 U.S.C. § 103(a) as obvious over Sibley et al. (US 4,162,776). The rejection of claims 15-36 is hereby traversed in view of the following discussion and amendments to independent claims 15 and 27. The Examiner indicates that Sibley et al. discloses a system having a mounting structure within a body. The system has a mounting structure 20, platform 34 where a camera/sensor 90 is mounted, linear guide 32 (Figure 5), and a mechanism 64 for moving the platform. Regarding claim 27, the Examiner interprets the linear guide as element 71 (Figures 8-9). The Examiner notes that the mounting structure can also be interpreted as the U-shaped cross section at the bottom or lowermost part of the apparatus in Figure 8A. Applicants respectfully submit, however, that Sibley et al. does not describe or suggest such a combination.

In particular, Sibley et al. does not describe or suggest a linear guide that engages any sensor platform. The Examiner refers to Figure 5 of Sibley et al. with respect to the alleged disclosure of a linear guide (element 32). However, a linear guide such as that of Applicants' invention is not shown by Figure 5, or described with respect to Figure 5.

Sibley et al. does describe, with respect to Figure 6A, a first means 30 for mounting, supporting, and releasably holding the film-loaded camera 80 in an angularly adjustable position:

"This means 30 includes a first subassembly 31 which comprises: a first frame member 32, essentially rectangular in shape, having a first end 32A and a second end 32B and, of course, weight; a box section, generally designated 33, hingedly attached to the first frame member 32, near the first end 32A of it 32; and a fifth means 34, adjacent to the box section 33 and attached to the first frame member 32 at the first end 32A, for selectively varying the angularity of the film-loaded camera 70 in relation to the first frame member 32."

Col. 3, lines 61-68 and Col. 4, lines 1-6.

As shown and described in Sibley et al., the alleged linear guide 32 is not a linear guide, but rather functions structurally as a subassembly or frame member that protrudes into the

atmosphere without the added protection of a linear guide. The linear guide of Applicants' invention is a stabilizer over and above the subassembly or frame member of Sibley et al. in that the former helps to prevent deflection of the platform when the platform is extended into the atmosphere.

The Examiner further refers to Figures 8-9 of Sibley et al. with respect to the alleged disclosure of a linear guide (element 71) in connection with claim 27. However, a linear guide such as that of Applicants' invention is not shown by Figures 8-9, or described with respect to Figures 8-9.

Sibley et al. does describe, with respect to Figures 8-9, a subassembly or frame member, such as an adapter means for removably holding, detachably interconnecting, and slidably moving simultaneously the subassemblies of Figure 6A-6B, and 7A-7C. In particular, a third subassembly of a third means 50 for removably holding the first means 30 (described above with respect to Figure 6A) and the second means 40 in parallel, equal spaced-apart relationship, and for detachably interconnecting the first means 30 and the second means 40, and also for slidably moving simultaneously the first means 30 and the second means 40 in opposite directions, further comprises a first plurality of roller bars 71, 72, and 73. Col. 4, lines 24-30 and Col. 5, lines 35-37. The plurality of roller bars 71, 72, and 73 are attached in a

vertical position to the front vertical surface 52A of the third frame member 52. Col. 5, lines 35-37.

As shown and described in Sibley et al., the alleged linear guide 71 with respect to claim 27 is not a linear guide, but rather functions structurally as a subassembly or frame member that protrudes into the atmosphere without the added protection of a linear guide. As earlier stated herein, the linear guide of Applicants' invention is a stabilizer over and above the subassembly or frame member of Sibley et al. in that the former helps to prevent deflection of the platform when the platform is extended into an atmosphere.

Moreover, Applicants respectfully disagree with the Examiner's conclusion that the mounting structure can also be interpreted as the U-shaped cross section at the bottom or lowermost part of the apparatus in Figure 8A. The alleged mounting structure as identified by the Examiner in Figure 8A merely functions structurally as a subassembly as previously described above. In Applicants' invention, however, the mounting structure 100 secures and guides the lift platform along a linear path for extension and retraction in an atmosphere.

Further, unlike Applicant's invention, Sibley et al. does not teach the use of "a linear guide connected to the mounting structure at a first end of the linear guide and connected to the platform at a second end of the linear guide, wherein the linear guide is engaged by an annular engagement structure connected to the platform and comprises an elongated member disposed along and in parallel to a linear movement path of the platform to stabilize and direct linear movement of the platform in an atmosphere." Accordingly, Applicants have amended claims 15 and 27 to reflect the aforementioned differences between Applicants' invention and Sibley et al.

The Examiner further indicates as for the mechanism that is electronically, hydraulically, magnetically, pneumatically, linear motion screw, or clutch and brake driven, it would have been obvious to one skilled in the art to have used any mechanism that is needed to drive the platform. However, Sibley et al. does not disclose "a linear guide connected to the mounting structure at a first end of the linear guide and connected to the platform at a second end of the linear guide, wherein the linear guide is engaged by an annular engagement structure connected to the platform and comprises an elongated member disposed along and in parallel to a linear movement path of the platform to stabilize and direct linear movement of the platform in an atmosphere", as required by independent claims 15 and 27.

Accordingly, favorable reconsideration and withdrawal of this rejection is respectfully requested.

Claims 16-26 and 28-36 depend on independent claims 15 and 27, respectively, as traversed above, and, thus, the rejection with respect to them is moot.

Claims 15-17 and 19-29 stand rejected under 35 U.S.C. § 102(b) as anticipated by or, in the alternative, under 35 U.S.C. § 103(a) as obvious over Mackenzie (US 5,969,686). The rejection of claims 15-17 and 19-29 is hereby traversed in view of the following discussion and amendments to independent claims 15 and 27. The Examiner indicates that Mackenzie discloses a system having a mounting structure within a body that could be interpreted as element 32. The system has a platform 18 where a camera/sensor 12 is mounted, linear guide (Figure 2), door 13, and mechanism 30 for moving the platform. The linear guide is interpreted as the extendable parts with one end connected to the mounting structure and the other end connected to the platform (Figure 2). Applicants respectfully submit, however, that Mackenzie does not describe or suggest such a combination.

In particular, Mackenzie does not describe or suggest a linear guide that engages any sensor platform. The Examiner refers to Figure 2 of Mackenzie with respect to the alleged disclosure of a linear guide. However, a linear guide such as

that of Applicants' invention is not shown by Figure 2, or described with respect to Figure 2.

Mackenzie does describe, with respect to Figure 2, a retractable forward looking radome assembly 12 coupled to a mechanism (not a linear guide), which extends and retracts the radome assembly from and into the nose of the aircraft. A hydraulic piston 30 having one end 32 mounted to the inside of the nose portion 10 and the other end 34 mounted to the radome assembly 12 raises and lowers the radome assembly. Col. 5, lines 1-6.

As shown and described in Mackenzie, the alleged linear guide (extendable parts in Figure 2) is not a linear guide, but rather functions structurally as a hydraulic mechanism that raises and lowers the radome assembly into the atmosphere without the added protection of a linear guide. The linear guide of Applicants' invention is a stabilizer over and above the hydraulic mechanism of Mackenzie in that the former helps to prevent deflection of the platform when the platform is extended into the atmosphere.

Moreover, unlike Applicants' invention, Mackenzie does not teach the use of a "a linear guide connected to the mounting structure at a first end of the linear guide and connected to the platform at a second end of the linear guide, wherein the linear guide is engaged by an annular engagement structure connected to

the platform and comprises an elongated member disposed along and in parallel to a linear movement path of the platform to stabilize and direct linear movement of the platform in an atmosphere." Accordingly, Applicants have amended claims 15 and 27 to reflect the aforementioned differences between Applicants' invention and Mackenzie.

The Examiner further indicates as for the mechanism that is electronically, magnetically, linear motion screw, or clutch and brake driven, it would have been obvious to one skilled in the art to have used any mechanism that is needed to drive the platform. However, Mackenzie does not disclose "a linear guide connected to the mounting structure at a first end of the linear guide and connected to the platform at a second end of the linear guide, wherein the linear guide is engaged by an annular engagement structure connected to the platform and comprises an elongated member disposed along and in parallel to a linear movement path of the platform to stabilize and direct linear movement of the platform in an atmosphere", as required by independent claims 15 and 27.

Accordingly, favorable reconsideration and withdrawal of this rejection is respectfully requested.

Claim 18 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Mackenzie in view of Sibley et al. The Examiner indicates that it would have been obvious to one skilled in the art to have used cameras in the sensor system of Mackenzie as taught by Sibley et al. to retrieve more data. In response thereto, claim 18 depends on independent claim 15, as traversed above, and, thus, the rejection with respect to it is moot.

Applicant respectfully requests that the Examiner consider the amendments to the claims and pass this case to issue.

Respectfully submitted,



Lisa A. Karczewski, Reg. No. 53,096

CHAN LAW GROUP LLP  
1055 West Seventh Street, Suite 1880  
Los Angeles, CA 90017-2544  
(213) 624-6560 x115 Telephone  
(213) 622-1154 Facsimile